

1 Roopal P. Luhana
 2 **CHAFFIN LUHANA LLP**
 3 600 Third Avenue, Floor 12
 4 New York, NY 10016
 5 Telephone: (888) 480-1123
 6 luhana@chaffinluhana.com

7 Sarah R. London
 8 **GIRARD SHARP LLP**
 9 601 California St., Suite 1400
 10 San Francisco, CA 94108
 11 Telephone: (415) 981-4800
 12 slondon@girardsharp.com

13 Rachel B. Abrams (SBN 209316)
 14 **PEIFFER WOLF CARR KANE**
 15 CONWAY & WISE, LLP
 16 555 Montgomery Street, Suite 820
 17 San Francisco, CA 94111
 18 Telephone: (415) 426-5641
 19 rabrams@peifferwolf.com

20 *Co-Lead Counsel for Plaintiffs*

21 *[Additional Counsel Listed on Signature Pages]*

22
 23
 24
 25
 26
 27
 28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

29
 30 IN RE: UBER TECHNOLOGIES, INC.,
 31 PASSENGER SEXUAL ASSAULT
 32 LITIGATION,

33 Case No. 3:23-md-03084-CRB

34 **STIPULATION AND [PROPOSED]
 35 ORDER REGARDING ECF NO. 4369**

36
 37 This Document Relates to:

38 Judge: Hon. Charles R. Breyer
 39 Courtroom: 6 – 17th Floor

40
 41 ALL ACTIONS

RECITALS

WHEREAS, on November 12, 2025, Defendants filed an Administrative Motion for Entry Of an Order Establishing Common Fact Discovery Cut-Off (“Motion”)(ECF No. 4369);

WHEREAS, Plaintiffs' Response to Defendants' Motion is due on or before November 17, 2025;

WHEREAS, Plaintiffs request that they be granted an additional eight (8) days to file their Response to Defendants' Motion, with said Response to be due on or before November 25, 2025; and

WHEREAS, Defendants consent to Plaintiffs' request.

STIPULATION

NOW, THEREFORE, the parties hereby agree and request the Court enter the parties' stipulation as follows:

1. Plaintiffs shall be granted an extension to respond to Defendants' Administrative Motion for Entry Of an Order Establishing Common Fact Discovery Cut-Off ("Motion") (ECF No. 4369) with said Response to be due on or before November 25, 2025.

IT IS SO STIPULATED.

Dated: November 14, 2025

Respectfully submitted,

By: /s/Roopal P. Luhana

Roopal P. Luhana (Admitted *Pro Hac Vice*)

CHAFFIN LUHANA LLP

600 Third Avenue, Floor 12

New York, NY 1001

Telephone: (888) 480-1123

luhana@chaffinluhana.com

Sarah R. London

SARAH R. LEHRACH

CHAKK SHAKK LTD
601 California St. Suite 140

801 California St., Suite 1100
San Francisco, CA 94108

San Francisco, CA 94108
Telephone: (415) 981-4800

1
2 Rachel B. Abrams (SBN 209316)
3 **PEIFFER WOLF CARR KANE**
4 CONWAY & WISE, LLP
5 555 Montgomery Street, Suite 820
6 San Francisco, CA 94111
7 Telephone: (415) 426-5641
8 rabrams@peifferwolf.com

9
10 *Co-Lead Counsel for Plaintiffs*

11 By: /s/ Christopher D. Cox
12 Christopher D. Cox (Admitted *Pro Hac Vice*)
13 Jessica Davidson (Admitted *Pro Hac Vice*)
14 **KIRKLAND & ELLIS LLP**
15 601 Lexington Avenue
16 New York, NY 10022
17 Telephone: (212) 446-4800
18 jessica.davidson@kirkland.com
19 christopher.cox@kirkland.com

20 Laura Vartain Horn (SBN 258485)
21 **KIRKLAND & ELLIS LLP**
22 555 California Street, Suite 2700
23 San Francisco, CA 94104
24 Telephone: (415) 439-1625
25 laura.vartain@kirkland.com

26 Allison M. Brown (Admitted *Pro Hac Vice*)
27 **KIRKLAND & ELLIS LLP**
28 2005 Market Street, Suite 1000
29 Philadelphia, PA 19103
30 Telephone: (215) 268-5000
31 alli.brown@kirkland.com

32
33 *Counsel for Defendants*
34 UBER TECHNOLOGIES, INC.,
35 RASIER, LLC, and RASIER-CA, LLC

36
37 **ATTESTATION**

38 Under Civil Local Rule 5-1(h)(3), I attest that all signatories listed, and on whose behalf the
39 filing is submitted, concur in the filing's content and have authorized the filing.

40
41 Dated: November 14, 2025

42 By: /s/Roopal P. Luhana

1 **[PROPOSED] ORDER**
2

3 PURSUANT TO STIPULATION, IT IS SO ORDERED.
4

5 DATED: November 14, 2025
6



7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28